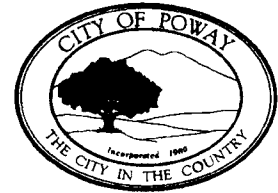


## CITY OF POWAY

MICKEY CAFAGNA, Mayor  
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BETTY REXFORD, Councilmember



April 9, 2008

Billie Blanchard, CPUC / Lynda Kastoll, BLM  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104-3002

Subject: Draft Environmental Impact Report/Environmental Impact Assessment (EIR/EIS)  
and Proposed Land Use Amendment for the Proposed Sunrise Powerlink  
Project, Sch. No. 2006091071

Dear Ms. Blanchard and Ms. Kastoll:

Thank you for the opportunity to review the Draft EIR/EIS for the Sunrise Powerlink project. The City's Development Services Department has reviewed the Draft EIR/EIS and offers the following comments and local perspective for consideration by the California Public Utilities Commission (CPUC) in the preparation of the Draft EIR/EIS.

- Fire and Fuels Management

In the Draft EIR/EIS Figure D.15-30 Poway Fireshed, D.15.31 Burn Probability Model, and Figure D.15-32 Wildfire Containment Conflict Model respectively indicate the Poway section of the Coastal Corridor has the highest number of recorded fires of all the Proposed Project Firesheds, has a high to very high probability of catching fire, and has a high to very high level of conflict with wildfire suppression efforts created by the introduction of the proposed overhead transmission line. These factors, individually or collectively, and as stated in the Draft EIR/EIS, have the potential to lead to a wildfire that would impact Foster, Rancho Encantada, the southeast half of Poway, the east side of Miramar Ranch and Scripps Ranch, placing more than 330 homes at risk, and potentially engulfing Sycamore Canyon and Los Peñasquitos Canyon Preserves.

Proposed mitigation measures to reduce the level of risk do not appear adequate to prevent, from what the studies indicate, an inevitable situation. With these statistics now available to the public, the assumed financial responsibility for such a fire should warrant reconsideration of the project or of an alternative design to reduce the fire risk. One alternative to reduce the fire and financial risk along this corridor is the Pomerado Road to Miramar Area North Alternative. The City of Poway supports this alternative, as the proposed power line route avoids the Poway section of the Coastal Corridor and places a larger percentage of the power line underground, thereby reducing the level of fire risk.

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- Public Health and Safety:

Increased power option - One of the main issues regarding the Sunrise Powerlink project is the potential health effect associated with long-term and potentially increased exposure to electromagnetic fields (EMFs) from power lines. Between San Diego's Scripps Ranch and Poway's Rolling Hills Estates, the existing narrow utility easement contains several SDG&E circuits, including a 69kV, a 138kV and a 230kV, cumulatively carrying approximately 437kV of power. The proposed Sunrise Powerlink project would increase the capacity to 667kV or more, by adding one or two additional 230kV lines on a new 120-foot-high tower. In the Poway segment, the towers are inappropriately offset to the north side of the utility easement, adjacent to the homes. In some situations the location of the existing power lines are less than 80 feet from the bedrooms of many of these homes.

As described in Section B.2.7 of the Draft EIR/EIS, the Central East Substation, which would be built as a part of the Sunrise Powerlink project, would accommodate up to six 230kV circuits. Only two circuits are proposed by SDG&E at this time, but construction of additional 230 kV circuits out of the Central East Substation west to the coast may be required within the next 10 years. The potential impacts generated by the additional wires could include an increased health risk from higher EMFs, an increased fire risk, an increase in noise levels, and additional impacts yet to be evaluated in other environmental issue areas. The potential impacts of a 300-500% increase in the amount of power and wires over what is evaluated in this report may result in a highly significant level of increased impacts in all environmental discussion areas. As many environmental, personal, and financial decisions will be based on the information provided in the Draft EIR/EIS report, it seems prudent to expand the scope of the Draft EIR/EIS to include the evaluation of the 6-wire option.

EMF - While the potential health hazards associated with EMF remain in dispute, most homeowners living adjacent to the proposed power lines consider this issue as a significant concern. Mitigation measures in Section D.10 of the Draft EIR/EIS suggest four methods to reduce the strength of the EMF; placing the wires higher aboveground, burying the power lines underground, increasing the width of the ROW, or using a canceling technique. In the Poway Coastal Corridor, the suggested mitigation measures do not appear adequate, as the limited width easement will significantly reduce the ability to increase the distance between power lines and homes. The Draft EIR/EIS states the canceling technique is of limited value because of the potential for short circuits if the wires are placed too close together. There are also worker safety issues to consider if spacing is reduced. Under the proposed Plan, the new pole and wires would be placed at a similar height as the existing power lines. The best method to reduce EMFs is to underground the power lines. Should a version of the Sunrise Powerlink project be approved, the City of Poway strongly urges the CPUC to mitigate this real problem by approving the placement, at minimum, of the new two 230kV Sunrise Powerlink lines underground. The City would prefer that all utility lines within this corridor

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segment be placed underground. To accommodate this request, it is suggested that SDG&E use the existing roadway franchise, utility easement, and rights-of-way to route and/or underground the Sunrise Powerlink lines away from these homes. Alternatively, the City of Poway also supports the Draft EIR/EIS Pomerado Road to Miramar Area North Alternative, which relocates the new power lines along Pomerado Road away from the Rolling Hills estates, as well as placing the power lines safely underground.

- Noise

Homes in Rolling Hills Estates in Poway are located within 100 feet of the existing towers. Depending on the configuration and location of the lines, the project could create a noticeable increase in nighttime noise. The Draft EIR/EIS states there are few options for mitigating this noise source, and propose Mitigation Measure N-3a to minimize the nuisance to the extent feasible. The report indicates that the noise increase would remain and create an infrequent and unavoidable impact. Mitigation measure N-3a is "Respond to complaints of corona noise." The City finds that this mitigation measure is inadequate to address a permanent impact.

- Project Alternatives

The Draft EIR/EIS analyzes seven possible routes for the Sunrise Powerlink project, plus the no-project alternative. Each route was ranked on its environmental effects with the Environmentally Superior Alternative listed first, followed by the incrementally more impactful routes. The proposed project is listed as the sixth least desirable alternative in the Draft EIR/EIS. Should a project be approved, the City of Poway would encourage the CPUC to select one of the more superior environmentally and economically viable routes.

Thank you for your time and consideration of our concerns. Should you have questions regarding these comments please contact Jim Lyon, Senior Planner, at (858) 668-4657 or at [jlyon@ci.poway.ca.us](mailto:jlyon@ci.poway.ca.us).

Sincerely,



Rod Gould  
City Manager